

**United States Bankruptcy Court
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:	:	
American Aviation Manassas, LLC	:	Case No. 24-11443-BFK
		(Chapter 7)
Debtor	:	

**APPLICATION PURSUANT TO FED. R. BANKR. P. 1007 FOR AN ORDER
GRANTING AN EXTENSION OF TIME TO FILE DEBTOR'S STATEMENT OF
FINANCIAL AFFAIRS AND SCHEDULES**

American Aviation Manassas, LLC (the “Debtor”), and files this Motion to Extend
Deadline to File Schedules, Statement of Affairs and other documents:

SUMMARY OF RELIEF REQUESTED

1. By this application (the “Motion”), the Debtor seeks entry of an order, pursuant to Rule 1007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and §521 of the United States Code (the “Bankruptcy Code”), extending through August 28, 2024 (a date eight (8) days prior to the scheduled 341 hearing in this matter), the time within which it must file its Statement of Financial Affairs, Schedule of Assets and Liabilities, and Schedule of Executory Contracts and Unexpired Leases, and other documents (such statement and schedules hereinafter referred to as the “Schedules”). For the reasons set forth below, additional time is needed to ensure that these documents, when filed, represent the most accurate and complete data to facilitate the ongoing administration of this Chapter 7 case.

JURISDICTION

2. The Court has jurisdiction over this Motion under 28 U.S.C. § 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding is proper pursuant to 28 U.S.C. §1408 and §1409.

3. The statutory predicates for the relief requested herein are section 521 of the Bankruptcy Code, Fed. R. Bankr. P. 1007 and Local Rule 1007-1.

BACKGROUND

4. On August 6, 2024 (the “Petition Date”), the Debtor commenced its Chapter 7 case (the “Chapter 7 Case”) by the filing of a voluntary petition for relief under Chapter 7 of the Bankruptcy Code. Janet M. Meiburger, Esq., has been appointed the Chapter 7 Trustee in this matter.

5. Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007 require the Debtor to file the Schedules within 14 days following the Petition Date. The Schedules are due on August 20, 2024.

6. Fed. R. Bankr. P. 1007(a)(5) and (c), and Local Rule 1007-1 provides that any extension of time to file the Schedules may be granted only upon motion for cause shown. The Debtor submits that ample cause exists for an extension of time to file its Schedules for the reasons set forth below.

7. This bankruptcy case is one of four related matters, the total number of creditors in these matters is approximately five hundred (500). The principal of the Debtor, Kevin Rychlik (with the assistance of his spouse) is the only person that is working on the gathering of the information necessary to complete the Schedules. Mr. Rychlik has, in recent months, suffered several strokes and as a result must “pace” himself in the workload required to complete these tasks.

8. To provide the Debtor with sufficient time to obtain information required to complete the Schedules, all in the appropriate formats prescribed by the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules of the Eastern District of Virginia (the “Local Rules”), the Debtor seeks an extension of time to file its Schedules for eight (8) days through and including August 28, 2024.

9. Fed R. Bankr. P. 1007 provides for the extension, for cause, of the time for the filing of Schedules. In view of the circumstances of the filing of the Debtor's Chapter 7 Case, cause exists for the requested extension and no harm will befall creditors for a minor delay.

NOTICE

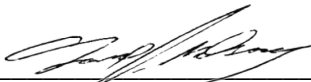
10. Notice of this Motion has been given to the Office of the United States Trustee, the Chapter 7 Trustee, those creditors who have entered an appearance in this case pursuant to Bankruptcy Rule 2002, and the secured creditors in this matter, together with the 20 largest creditors as required by Local Rule 1007-1.

NO PREVIOUS REQUEST

11. No prior motion for the relief requested herein has been made to this or any other Court.

WHEREFORE, the Debtor respectfully requests that the Court enter an order granting an extension of time to file the Schedules through and including August 28, 2024, as set forth herein, and grant such further relief as is just and proper.

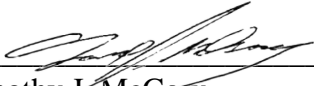
AMERICAN AVIATION MANASSAS, LLC
By Counsel



Timothy J. McGary, #21208
Counsel for Debtor
8609 Westwood Center Drive, Suite 203
Vienna, VA 22182-7521
(703) 636-7107 or (888) 636-7107 (Voice)
(703) 636-7108 or (888) 636-7108 (Fax)
E-mail: tjm@mcgary.com

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was mailed, postage prepaid on August 20, 2024, to the following:


Timothy J. McGary

Business Ventures Management,
LLC
3975 University Drive
Suite 410
Fairfax, VA 22030

Donald G Costello Trust c/o Sally
Hostetler
1775 Wiehle Ave
Ste 400
Reston, VA 20190

Everest Business Funding
102 W 38th St
6th Floor
New York, NY 10018

Frederic Gumbinner and Brad Mann
3975 University Drive
Suite 410
Fairfax, VA 22030

Hubert Zucker, HR Ztech LLC
PO Box 223711
Chantilly, VA 20153

Icon Finance, LLC c/o Gross,
Romanick, Dean
3975 University Drive
Suite 410
Fairfax, VA 22030

Philip Saenger
2601 Babcock Rd
Vienna, VA 22103

Santorini Services LLC
2000 Massachusetts Ave
Washington, DC 20036

Slate Funding
15 America Ave
Suite 303
Lakewood, NJ 8701

Westbrooke Homes
7989 Kings Hwy
King George, VA 22485

Atty: James P. Campbell, Esq,
Campbell Flannery
1602 Village Market Blvd Suite
Ste 225
Leesburg, VA 20175

Caplin & Drysdale
One Thomas Circle NW
Ste 1100
Washington, DC 20005

Charles Kuhn c/o JK Moving
6511 MEGILLS CROSSING WAY
Clifton, VA 20124

Christopher Salisbury
9137 Grant Ave
Manassas, VA 22106

Danny Miller
12207 Woodlark Ct
Manassas, VA 20112

Darren Smith
311 Cutter Cove
Stafford, VA 22554

Donald D and Deborah L Harris
PO Box 129
Brandywine, WV 26802

Donald O Hewitt
2051 Hillside Dr
Falls Church, VA 22105

Dulles Aviation Inc
13141 Flynn Ct
Bristow, VA 22112

Eric H. Norby c/o Woodburn
Nuclear Medicine
3289 Woodburn Rd
Ste 060
Annandale, VA 22115

George Watson, Approach LLC
7 Planters Place
Stafford, VA 22554

JA Hawk Leasong LLC
43W700 US Rte 30
Sugar Groove, GA 30051

James W. VanLuven, TTE VAN
LUVEN TRUST
6311 Liberty Road
Bealeton, VA 22712

Joseph Bechtold
544 7th st SE
Washington, VA 22110

Joshua McCreary
102 Brittany Lane
Suffolk, VA 23435

Kevin Roll
2282 Dosinia Ct
Newport News, VA 23602

Kuehn Family Trust,R. Michael
Kuehn & Susan
10505 Dunn Meadow Rd
Vienna, VA 22182

Marianne Hallet
9712 Handerson Pl
Unit 406
Manassas Park, VA 22109

Michael Hasz
1503 North Village Rd
Reston, VA 20194

Thida Aung
7480 Birchwood Ave
Apt 321
McLean, VA 22102